

UNITED STATES DISTRICT COURT
- DISTRICT OF MAINE -

John Jay Gordon,
PLAINTIFF

v.
RODNEY BAFFORD, et al.,
DEFENDANTS

CIVIL NO:

1:16-cv-00372-JAW

(SANT: 18
OCT 31)
(NOV. 16 18
(NOV. 16 18)

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS ON DEFENDANT RODNEY BAFFORD

Pursuant to Rule 34 F.R.C.P., the Plaintiff requests that Defendant Rodney Bafford produce the documents listed below within 30 days upon receipt of this request either by providing the Plaintiff with copies or making them available to the Plaintiff for inspection and copying.

(Acp) 1. The Administrative Control Pod (ACP) was being created and formed inside the Special Management Unit (SMU) of Maine State Prison (MSP) between the dates of May 1, to November 1, 2014. I request the (AcP) document(s) that lists the names of all MSP inmates who were either in the ACP or who were being considered for ACP placement on November 1, 2014. (If the above is too vague

ATTACHMENT C

or TOO BURDENOME, PLEASE LIST THE NAMES
of THE FIRST 15 INDUCTEES INTO THE ACP.
CAPTAIN HOWLETT WAS THE SAIL MANAGER
AT THE TIME of THE ABOVE LISTED DATES).

I certify That The Above request for
production of documents on DEFENDANT
RANIER BURFFARD is lawful, NOT IM-
properly MOTIVATED AND NOT UNREASON-
ABLY BURDENOME or EXPENSIVE.

DATED This 31st Day of October, 2017.

John Jay Condon · John J. C.

John J. Condon

#148840

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